



State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Technical Analysis and Findings

Utah Coal Regulatory Program

PID: C0070042
TaskID: 4727
Mine Name: STAR POINT REFUSE
Title: NOV#12148 RESPONSE

Summary

SCA-Star Point Refuse and Slurry submitted a response to Task #4685 deficiencies in regard to NOV #12148. The edits included updates to reflect changes in Primary Road P as well as the Hydrology diversions. These edits included updates to the maps in the MRP to reflect field conditions of various ditches and culverts throughout the SCA Permit area. There are no deficiencies in regards to this Task #4727.

cparker

Operation Plan

Road Systems Classification

Analysis:

Section 527.100-200 was updated to include the changes made to Primary Road P. The text in this section was edited to add Primary Road P as a primary haul road within SCA Star Point Permit Area. Table 527.100a Road Classification was also updated at this point in time to reflect two changes: the decrease in use of Primary Road F from regular to infrequent use and the addition of Primary Road P as the primary haul road with infrequent fuel hauling.

Sub Section 527.210 of the MRP was updated to reflect the specific changes in the design specification to Primary Road D, Primary Road F, Primary Road L and the addition of Primary Road P. The edits to the text are to show that all roads have been constructed and are currently used infrequently. Text added to Primary Road P describes how this haul road was the preferred access road to the coal refuse pile but is not longer and that unneeded segments of the old road that have been cut off due to new ditch placements may be reclaimed with reclamation work is done in this area.

Section 534 Roads of the MRP was updated to reflect the change in name of Primary Road P as well as update Table 534.200a Road Specifications to reflect the decrease length of Primary Road P due to realignment of ditches through the area.

Map 534.100e was updated to reflect the shortened length of Primary Road P.

cparker

Hydrologic Diversion General

Analysis:

The Permittee submitted their response to deficiencies listed under Task ID 4685. With this response, the Permittee submitted a cover letter detailing their response to each hydrology deficiency.

The Permittee updated tables 742b to reflect the correct flows in culvert 80B.

Maps 731.720a and 731.720b were cleaned up and the designation for each ditch and culvert is much clearer.

The Permittee provided an explanation for the removal of culverts 18A and 18B, which previously appeared to be removed without any reason. These two culverts were part of the prior Cyprus/RAG permits, so when RAG reclaimed the railroad beds (these culverts were use to convey water under the railroad tracks), the culverts were removed because they were no longer necessary.

Page 700-65 was updated to include concrete grout as a possible ditch lining option.

The Permittee also provided an explanation for the culvert south of ditch 6C. This culvert is not owned by SCA, it belongs to the BLM and so it is not included in the MRP.

Through the response and corrections made by the Permittee, all hydrology related deficiencies have been appropriately addressed.

adaniels

Reclamation Plan

Bonding Determination of Amount

Analysis:

Ditch 16, which is adjacent to the country road, has been lined with concrete but will remain in place post mining operations. Therefore no additional cost will need to be added to the bond at this time for demolition.

cparker